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10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 BEVERLY HARDY and ROBERT DAVID
13 HARDY,

CASE NO. 2:20-CV-00606-RFB-BNW

14 Plaintiffs,

15 v.

16 C. R. BARD, INC.; BARD PERIPHERAL
17 VASCULAR, INCORPORATED,

18 Defendants.

19 **STIPULATION AND [PROPOSED] ORDER TO STAY CASE**

20 The Parties, Plaintiffs BEVERLY HARDY and ROBERT DAVID HARDY and
21 Defendants, C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Bard”), by and through their
22 undersigned counsel, hereby stipulate that all activity in this case be stayed through and
23 including August 17, 2020, pursuant to Fed. R. Civ. P. 15(a)(2), for the following reasons.

24 Plaintiffs’ counsel represents approximately twenty (20) plaintiffs with cases
25 proceeding in this and other courts across the country asserting similar claims against
26 Defendants for injuries they contend arise out of their use of Defendants’ IVC filters.

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Counsel for Plaintiffs and Defendants are engaged in discussions in an attempt to achieve a global settlement of the cases and claims of the plaintiffs represented by Plaintiffs' counsel. Based on all the facts and circumstances, Plaintiffs' counsel believes that there is a good likelihood that the global settlement talks with Defendants will be successful.

As part of the agreement to engage in global settlement discussions, counsel for Plaintiffs and Defendants have agreed that all activity in all of the Plaintiffs' counsel's IVC filter cases should "stand-down" for sixty (60) days so that the Parties may focus their attention on their settlement efforts.

Additionally, the ongoing national emergency surrounding the Covid-19 pandemic has heightened the need for all Parties to conserve their resources as much as possible;

IT IS STIPULATED AND AGREED BY THE PARTIES that all activity in this case shall be stayed through and including August 17, 2020.

Respectfully submitted this 22nd day of June 2020.

GOLDMAN SCARLATO & PENNY, PC

GREENBERG TRAUERIG, LLP

By: /s/ Melissa Fry Hague

By: /s/ Eric W. Swanis

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Counsel for Plaintiffs

Counsel for Defendants

IT IS SO ORDERED.

Dated this 2nd of July, 2020.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **June 22, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi

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